

THE SUPREME COURT of the STATE OF MICHIGAN

I, Larry S. Royster, Clerk of the Michigan Supreme Court and Custodian of
the Roll of Attorneys admitted to the practice of law in this state, do hereby
certify that, as appears from the records,

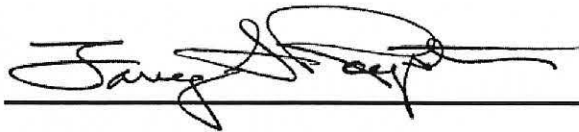
Michael Edward Piston

was admitted to the practice of law in the courts of the State of Michigan on

November 23, 1982

and has remained in good standing since then.

In Testimony Whereof, I set my hand and
affix the seal of the Michigan Supreme
Court on this date: October 04, 2016

A handwritten signature in black ink, appearing to read "Larry S. Royster", is written over a horizontal line.

Clerk